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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

15 This Document Relates To:

**STIPULATION AND [PROPOSED]
ORDER MODIFYING DEADLINE
FOR FILING OF MOTIONS TO
COMPEL**

16 Case No. 09-cv-5609 SI
17 NOKIA CORPORATION and
NOKIA, INC.,

18 Plaintiffs,

19 v.

20 AU OPTRONICS CORPORATION, et al.

21 Defendants.

23 Plaintiffs Nokia Corporation and Nokia, Inc. and Defendants (collectively,

24 "Parties") hereby stipulate as follows:

25 **STIPULATION**

26 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the
27 Stipulation and Order Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff
28 and State Attorney General Actions (Dkt. No. 3110, the "Scheduling Order");

1 WHEREAS the Court has entered an Order extending the close of fact discovery set
2 forth in the Scheduling Order for the limited purpose of allowing sufficient time for
3 defendants to take the depositions of Nokia employees Juha Liukkonen and Timo Mustonen
4 (Dkt. No. 4254);

5 WHEREAS the Court has entered an order extending the close of fact discovery set
6 forth in the Scheduling Order for the limited purpose of extending the deadline for which
7 Nokia and certain other Direct Action Plaintiffs in Track One have to respond to discovery
8 requests served by defendants between October 31 and November 4, 2011 and to update
9 Exhibit A (chart of conspiracy evidence) to previously served discovery responses (Dkt.
10 4350);

11 WHEREAS, the Court has entered an Order extending the time for the filing of
12 motions to compel as to Nokia's and defendants' remaining discovery responses (Dkt.
13 4387);

14 WHEREAS the parties are continuing to meet and confer regarding two issues
15 related to Nokia's response to defendants' discovery: (1) Nokia's production of data
16 regarding the cost of production of Nokia handsets; and (2) Nokia's deposition testimony in
17 response to topic 16 of defendants' Fed. R. Civ. P. 30(b)(6) deposition notices to Nokia;

18 WHEREAS, the parties hope to resolve these issues informally, without the need to
19 file motions to compel and seek the Court's involvement;

20 WHEREAS the current deadline for parties to file motions to compel with respect to
21 these issues is January 13, 2012 (*see* Dkt. 4387); and

22 WHEREAS in an effort to facilitate the informal resolution of these issues, the
23 parties wish to extend the deadline for defendants to file any motions to compel with
24 respect to them through January 27, 2012.

25 NOW, THEREFORE, the Parties, through their undersigned respective counsel,
26 stipulate and agree as follows:

27 The deadline for defendants to file any motion to compel with respect to (1) Nokia's
28 production of data regarding the cost of production of Nokia handsets, and (2) Nokia's

1 deposition testimony in response to topic 16 of defendants' Fed. R. Civ. P. 30(b)(6)
2 deposition notices to Nokia, is extended through and including January 27, 2012.

3 Dated: January 12, 2012.

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12 NOKIA CORPORATION

13 **IT IS SO ORDERED.**

14
15 Dated Entered: 1/18/12

The Honorable Susan Illston
District Court Judge



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17 **ATTESTATION:** Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that
18 concurrence in the filing of this document has been obtained from each signatory hereto.
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